Case: 1:13-cv-05037 Document #: 132 Filed: 05/17/19 Page 1 of 29 PageID #:887

FILED FC JN THE 5/17/2019 UNFTED STATES DISTRICT COURT

CLERK, U.S. DISTRICT CONTORTHERN DISTRICT OF ILLINOIS

LESTER DOBBEY,

Plaintiff,

CASE NO. 13-CV-5037

Lester Carter,

Mary Rolland

Scanned at etatesville cc and e-monor

Ch. 29 magnitude

Lester Dobbey,

Case No. 13-CV-5037

Lester Dobbey,

Mary Rolland

PLAINTIFFS THIRD MOTION TO ENFORCE SUBPOENA
AGAINST (NON-PARTY) WEXFORD HEALTH SOURCES, TUC.

Plaintiff, LESTER DOBBEY, pro SE, pursuant to Federal Rules of Civil Procedure 45, moves this Howarable Court to Enforce Subpoena against the (Non-party) Wextord HEAHL. Sources, Inc. and grant Sanctions.

IN Support Thereof:

1. ON FEBRUARY 20,2019, PlAINTIFF ISSVED

And SERVED (NON-PARTY) WEXFORD HEAlth Sources,
Inc., with A 15 page Subpoena, Commanding
PRODuction OF: "DEFENDANT'S Job DESCRIPTION,
Dution and Responsibilities; Various Wextopal
Policies, Manuals, Contracts, Complaint Files, and
Employee Names." (Exhibit-1).

- 2. The Subpoent Commanded preduction of RESPONSIVE RECORDS by MARCH 11, 2019, by 1:00 p.m. (Exhibit-1).
- 3. ON MARCH 13, 2019, during a Status HEARING before this Court, DEFENSE Attorney James MARUNA, Advised this Court that (NON-PARTY) WEXTORD HEATH SOURCES, Insc., had Just Received the Suppoena I believe. Magistrate Judge Rowland Extended the time For compliance and/or Response. (SEE, 3.13.19 TRANSCRIPTS).
- 4. As OF May 17, 2019, Plaintiff has NOT RECEIVED ANY RESPONSE OR RESPONSIVE RECORDS FROM (NON-PARMY) WEXTORD HEATH SOVERED, INC., NOR has

- Plaintiff heard from MR. MARUNA, in the regard. (Exhibit-Z).
- 5. PlaintiFF ASKS this Howarable Court to ENTORCE SAID Subprema (Ex.1) And Compel (NON-party) Westord to produce Said Records, Without Cost to PlaintiFF, AS A Sanction For Failure to comply.
- 6. ON MARCH 20,2019, Plaintiff issued and SERVED (NON-party) WEXTORD HEAlth Sovrces, Inc., with another Subpoent, Commanding production of: "Daily Attendance Records For DEFENDANT." (Exhibit-3).
 - 7. The Subpoens Commanded production of RESPONSIVE RECORDS by April 8, 2019, by 1:00 p.m., . (Exhibit-3).
- 8. As of May 17, 2019, Plaintiff has Not RECEIVED ANY RESPONSE OR RESPONSIVE RECORDS FROM (NON-PARTY) WEXTORD HEAlth Sources, INC., NOR HAS Plaintiff heard From MR. MARINA, in the REGARD. (EXhibit-4),

9. Plaintiff ASKS this Howerable Court to ENFORCE SAID Subpoeura (Ex. 3) and compel (NON-party) Wexford to product Said Records, without cost to Plaintiff, AS A SANCTION FOR NON-Compliance to Subpoeura.

10. Plaintiff ASKS this HoworAble Court to impose Further SANCTIONS IN the Amount OF \$2,500.00.

CONCLUSION

WHEREFORE, the Plaintiff, LESTER DOBBEY,

PRO SE, RESPECTFULLY ASKS this HONORABLE COURT to

GRANT this motion in Full, and ENTORCE the Attached

Subpoenas and grant Plaintiff's Sanction's Reguest.

RESpectfully,

LESTER DOBBEY
(PRO SE- Plaintiff)

UNITED STATES DISTRICT COURT

NORTHERY DISTRICT OF ILLINOIS Plaintiff Civil Action No. 13-CV-5037 v. SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION WEXFORD HEAlth SOURCES, I'ME, PRENTICE HALL CORPORATION, 801 Adlai Stevenson Drive, Springfield, IL 62703
(Name of person to whom this subpoena is directed) Production: YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: Any And All, Wexford Health Sources, Inc., Site Medical Director, Job Duties, Responsibilities and Descriptions, For Dr. Imhotep Carter, in Effective use From July 25, 2011 thru May 10, 2012. Which Shall include All signed Attestations made by Dr. Imhotep Carter. Place: LESTER DOBBEY, #R-16237 Date and Time: P.D. BOX 112 Joliet IIL 60434 MARCH 11,2019 At 1:00 p.m. ☐ Inspection of Premises: YOU ARE COMMANDED to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it. Place: Date and Time: The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so. FEB - 8 2019 Date: OR Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party) Plankiff LESTER DOBBEY , who issues or requests this subpoena, are:

ESTER DOBBEY, #R-16237, P.O. BOX 112, Joliet, Illinois 60434

Notice to the person who issues or requests this subpoena

(2 of 15.)

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF ILLINOIS

(3 oF 15.)

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF ILLINOIS

DIB (ICI)	OF ILLINOIS		
DR. IMHOTEP CARTER Defendant Defendant	Civil Action No. 13 - CV - 5037		
SUBPOENA TO PRODUCE DOCUMENT OR TO PERMIT INSPECTION OF P. WEXFORD HEALL SOURCES, I.J.C., To:	REMISES IN A CIVIL ACTION		
PRENTICE HALL CORPORATION, 801 Adlai S (Name of person to whom	HEVENSON DRIVE, SPRINGFIELD, IL 62703 this subpoena is directed)		
Deproduction: YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: Any and all, Wentord Health Sources, Inc., Provider Handbook: Physicial Psychiatrist, Nurse Practioners, and Physician Assistant, From the Year 2011 - Presentich Shall include any Amendments and Renewals.			
Place: LESTER DOBBEY: # R-16237	Date and Time:		
Place: LESTER DOBBEY, #R-16237 P.D. BOX 112 Joliet, IL 60434	MARCH 11, 2019 At 1:00 p.m.		
Inspection of Premises: YOU ARE COMMANDED to other property possessed or controlled by you at the time, date, may inspect, measure, survey, photograph, test, or sample the p	and location set forth below, so that the requesting party		
	Date and Time:		
The following provisions of Fed. R. Civ. P. 45 are attack Rule 45(d), relating to your protection as a person subject to a serespond to this subpoena and the potential consequences of not Date: FEB - 8 2019	ubpoena; and Rule 45(e) and (g), relating to your duty to		
CLERK OF COURT			
Evan Casal	OR		
Signature of Clerk or Deputy Clerk	Attorney's signature		
The name, address, e-mail address, and telephone number of the LESTER DOBBEY, #R-16237, P.O. Box	, who issues or requests this subpoena, are:		
Notice to the person who issues			

(4 of 15.)

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF ILLINOIS

Plaintiff\	
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v.)	Civil Action No. 13 - cv - 3037
	.,
DR. IMHOTEP CARTER	
Defendant)	
SUBPOENA TO PRODUCE DOCUMENTS	S, INFORMATION, OR OBJECTS
OR TO PERMIT INSPECTION OF PRI	EMISES IN A CIVIL ACTION
TO: WEXFORD HEAHL SOURCES, INC.,	
Position wall connection SDI Adlai Store	50 Dain 500 - 501 - 501 / 51 (122)
PRENTICE HALL CORPORATION, 801 Adlai Steves (Name of person to whom the	is subpoena is directed)
Production: YOU ARE COMMANDED to produce at the	
UDCUMENTS CIECTIONICALLY STOTED INTOTTUATION or objects and to be	remit inconntion, nonvine, testine, an annualization of the
material: Ary and All, WENTFORD HEALL SOURCES,	Trice Characte Case Suidelines Farm
material: Any and all, wexford HEATH Sources,: the year 2011 - PRESENT, which Shall include Recewals.	AND AND ALL AMENDAMENTS AND
RENEWALS.	the of March Mitteless and a miner
Place: LESTER DOBBEY, #R-16237 P.D. Box 112	Date and Time:
P.D. Box 112	
Joliet, IL 60434	MARCH 11, 2019 At 1:00 p.m.
Inspection of Premises: VOII APE COMMANDED to	sometic entert and the decimand of the decimal of the decimand
☐ Inspection of Premises: YOU ARE COMMANDED to p	d location act South below as that the second is
other property possessed or controlled by you at the time, date, an may inspect, measure, survey, photograph, test, or sample the project.	a location set forth below, so that the requesting party
may inspect, measure, survey, photograph, test, or sample the pro-	
	perty or any designated object or operation on it.
Place:	Date and Time:
Place:	Date and Time:
Place: The following provisions of Fed. R. Civ. P. 45 are attache	Date and Time: d – Rule 45(c), relating to the place of compliance:
The following provisions of Fed. R. Civ. P. 45 are attache Rule 45(d), relating to your protection as a person subject to a sub	Date and Time: d – Rule 45(c), relating to the place of compliance; poena; and Rule 45(e) and (g), relating to your duty to
Place: The following provisions of Fed. R. Civ. P. 45 are attache Rule 45(d), relating to your protection as a person subject to a sub respond to this subpoena and the potential consequences of not do	Date and Time: d – Rule 45(c), relating to the place of compliance; poena; and Rule 45(e) and (g), relating to your duty to
The following provisions of Fed. R. Civ. P. 45 are attache Rule 45(d), relating to your protection as a person subject to a sub	Date and Time: d – Rule 45(c), relating to the place of compliance; poena; and Rule 45(e) and (g), relating to your duty to
The following provisions of Fed. R. Civ. P. 45 are attache Rule 45(d), relating to your protection as a person subject to a sub respond to this subpoena and the potential consequences of not do Date: FEB - 8 2019	Date and Time: d – Rule 45(c), relating to the place of compliance; poena; and Rule 45(e) and (g), relating to your duty to
Place: The following provisions of Fed. R. Civ. P. 45 are attache Rule 45(d), relating to your protection as a person subject to a sub respond to this subpoena and the potential consequences of not do	Date and Time: d – Rule 45(c), relating to the place of compliance; poena; and Rule 45(e) and (g), relating to your duty to ing so.
The following provisions of Fed. R. Civ. P. 45 are attache Rule 45(d), relating to your protection as a person subject to a sub respond to this subpoena and the potential consequences of not do Date: FEB - 8 2019	Date and Time: d – Rule 45(c), relating to the place of compliance; poena; and Rule 45(e) and (g), relating to your duty to
The following provisions of Fed. R. Civ. P. 45 are attache Rule 45(d), relating to your protection as a person subject to a sub respond to this subpoena and the potential consequences of not do Date: FEB - 8 2019	Date and Time: d – Rule 45(c), relating to the place of compliance; poena; and Rule 45(e) and (g), relating to your duty to ing so. OR
The following provisions of Fed. R. Civ. P. 45 are attache Rule 45(d), relating to your protection as a person subject to a sub respond to this subpoena and the potential consequences of not do Date: FEB - 8 2019 CLERK OF COURT Casul	Date and Time: d – Rule 45(c), relating to the place of compliance; poena; and Rule 45(e) and (g), relating to your duty to ing so.
The following provisions of Fed. R. Civ. P. 45 are attache Rule 45(d), relating to your protection as a person subject to a sub respond to this subpoena and the potential consequences of not do Date: FEB - 8 2019 CLERK OF COURT Signature of Clerk or Deputy Clerk	Date and Time: d – Rule 45(c), relating to the place of compliance; poena; and Rule 45(e) and (g), relating to your duty to ing so. OR Attorney's signature
The following provisions of Fed. R. Civ. P. 45 are attache Rule 45(d), relating to your protection as a person subject to a sub respond to this subpoena and the potential consequences of not do Date: FEB - 8 2019 CLERK OF COURT Signature of Clerk or Deputy Clerk The name, address, e-mail address, and telephone number of the actions.	Date and Time: d – Rule 45(c), relating to the place of compliance; poena; and Rule 45(e) and (g), relating to your duty to ing so. OR Attorney's signature ttorney representing (name of party) Plaintiff,
The following provisions of Fed. R. Civ. P. 45 are attache Rule 45(d), relating to your protection as a person subject to a sub respond to this subpoena and the potential consequences of not do Date: FEB - 8 2019 CLERK OF COURT Signature of Clerk or Deputy Clerk The name, address, e-mail address, and telephone number of the attached to the subject to a subject to	Date and Time: d – Rule 45(c), relating to the place of compliance; poena; and Rule 45(e) and (g), relating to your duty to ing so. OR Attorney's signature ttorney representing (name of party) Plaintiff, who issues or requests this subpoena, are:
The following provisions of Fed. R. Civ. P. 45 are attache Rule 45(d), relating to your protection as a person subject to a sub respond to this subpoena and the potential consequences of not do Date: FEB - 8 2019 CLERK OF COURT Signature of Clerk or Deputy Clerk The name, address, e-mail address, and telephone number of the attached to the subject to a subject to	Date and Time: d – Rule 45(c), relating to the place of compliance; poena; and Rule 45(e) and (g), relating to your duty to ing so. OR Attorney's signature ttorney representing (name of party) Plaintiff, who issues or requests this subpoena, are:
The following provisions of Fed. R. Civ. P. 45 are attache Rule 45(d), relating to your protection as a person subject to a sub respond to this subpoena and the potential consequences of not do Date: FEB - 8 2019 CLERK OF COURT Signature of Clerk or Deputy Clerk The name, address, e-mail address, and telephone number of the and LESTER DOBBEY LESTER DOBBEY LESTER DOBBEY	Date and Time: d – Rule 45(c), relating to the place of compliance; poena; and Rule 45(e) and (g), relating to your duty to ing so. OR Attorney's signature ttorney representing (name of party) Plaintiff, , who issues or requests this subpoena, are: 12. Toliet, Illinois 60434
The following provisions of Fed. R. Civ. P. 45 are attache Rule 45(d), relating to your protection as a person subject to a sub respond to this subpoena and the potential consequences of not do Date: FEB - 8 2019 CLERK OF COURT Signature of Clerk or Deputy Clerk The name, address, e-mail address, and telephone number of the attached to the subject to a subject to	Date and Time: d - Rule 45(c), relating to the place of compliance; poena; and Rule 45(e) and (g), relating to your duty to ing so. OR Attorney's signature ttorney representing (name of party) Plaintit, , who issues or requests this subpoena, are: 12, Jaliet, Illinois 60434 requests this subpoena

it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF ILLINOIS Civil Action No. 13-CV-5037 SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION WEXFERD HEAHL SOVICES, INC., PRENTICE HALL CORPORATION, 801 Adlai Stevenson Drive, Springfield, IL 62703 Production: YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: Any and all, wexford HEAILL SOURCES, INC., CONTRACTS, with the Illinois Department of corrections, From the year 2011 - Present. which Shall include any and All Amendments and Renewals. Or otherwise the Contract that was in Effect during the time Frame Stated. Place: LESTER DOBBEY, #R-16237 Date and Time: P.O. Box 112 March 11, 2019 At 1:00 p.m. JOILET IL 60434 ☐ Inspection of Premises: YOU ARE COMMANDED to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it. Place: Date and Time: The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so. FEB - 8 2019 Date: CLERK OF COURT OR Attorney's signature The name, address, e-mail address, and telephone number of the attorney representing (name of party)

, who issues or requests this subpoena, are: DOBBEY, # R-16237, P.O. BOX 112, Joliet, Ilivois 60434

ESTER DOBBEY

Notice to the person who issues or requests this subpoena

(6 of 15)

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF ILLINOIS Civil Action No. 13 - CV - 5037 SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION WEXTORD HEATH SOURCES, INC.,
PRENTICE HALL CORPORATION, 801 Adlai Stevenson Drive, Spring Field, IL 62703
(Name of person to whom this subpoena is directed) Production: YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: Any And All, wextern theath Sources, Inc., Illinois Region Operations, Policies and Procedures Manual, From the year 2011 - Present. Which Shall include All Amendments And Renewals. Date and Time: Place: LESTER DOBBEY, # R-16237 P.O. BOX 112 MARCH 11, 2019 At 1:00 p.m. Joliet IL 60434 ☐ Inspection of Premises: YOU ARE COMMANDED to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it. Place: Date and Time: The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so. FEB - 8 2019 Date: OR Attorney's signature The name, address, e-mail address, and telephone number of the attorney representing (name of party) Plaintiff ESTER DOBBEY , who issues or requests this subpoena, are: DOBBEY, # R-16237, P.O. BOX 112, Joliet, Illinois 60434

Notice to the person who issues or requests this subpoena

(7 OF 15)

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF ILLINOIS Civil Action No. 13 - CV - 5037 SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION WEXTORD HEAHL SOURCES, INC., PRENTICE HALL CORPORATION, 801 Adlai Stevenson Drive, Springfield, IL
(Name of person to whom this subpoena is directed) Production: YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: Any and All, WEXFORD HEATH SOURCES, INC., PRISON OPERATION, POLICIES And PROCEDURE MANUAL, FROM THE YEAR 2011 - PRESENT. Which Shall include All AMENDMENTS AND RENEWALS. Place: LESTER DOBBEY, # R-16237 Date and Time: P.O. BOX 112 March 11, 2019 At 1:00 p.m. JOIST, IL 60434 ☐ Inspection of Premises: YOU ARE COMMANDED to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it. Place: Date and Time: The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so. FEB - 8 2019 Date: Attorney's signature The name, address, e-mail address, and telephone number of the attorney representing (name of party) , who issues or requests this subpoena, are: DOBBEY, # R-16237, P.O. BOX 112, Jolist, Illinois 60434

Notice to the person who issues or requests this subpoena

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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF ILLINOIS

DR. IMHOTER CARTER Defendant DESTER DOBBEY Plaintiff V. DR. IMHOTER CARTER Defendant	Civil Action No. 13-CV-5037		
SUBPOENA TO PRODUCE DOCUMENTS, OR TO PERMIT INSPECTION OF PREM To: Preshice Hall Corporation, 801 Adlai Steven (Name of person to whom this	Sons Drive, Spring Field, IL 62703 subpoena is directed)		
Production: YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: Any And All, westerd thealth Sources, Inte., Urology, Orthopedic And Gastro intestinal, Policies, Rules, Regulations, Protocols, Directives and Guidelines, From the year 2011 - Present. Which Shall include any Amendments and Renewals.			
Place: LESTER DOBBEY, #R-16237 P.O. BOX 112 Joliet, IL 60434	Date and Time:		
30 - 350 052 9 - 10 - 300 0 200 050 000	March 11, 2019 At 1:00 p.m.		
other property possessed or controlled by you at the time, date, and may inspect, measure, survey, photograph, test, or sample the property possessed or controlled by you at the time, date, and may inspect, measure, survey, photograph, test, or sample the property possessed or controlled by you at the time, date, and may inspect, measure, survey, photograph, test, or sample the property possessed or controlled by you at the time, date, and may inspect, measure, survey, photograph, test, or sample the property possessed or controlled by you at the time, date, and may inspect, measure, survey, photograph, test, or sample the property possessed or controlled by you at the time, date, and may inspect, measure, survey, photograph, test, or sample the property possessed or controlled by you at the time, date, and may inspect, measure, survey, photograph, test, or sample the property possessed or controlled by you at the time, date, and may inspect, measure, survey, photograph, test, or sample the property possessed or controlled by you at the time, date, and the property possessed or controlled by you at the time, date, and the property possessed or controlled by you at the property possessed or controlled by you at the time, date, and the property possessed or controlled by you at the property possessed or controlled by you	location set forth below, so that the requesting party		
Place:	Date and Time:		
The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so. Date: FEB - 8 2019			
CLERK OF COURT OR Signature of Clerk or Deputy Clerk	OR Attorney's signature		
The name, address, e-mail address, and telephone number of the att	orney representing (name of party) Plaintiff, , who issues or requests this subpoena, are:		
LESTER DOBBEY, # R-16237, P.O. BOX 11	2, Jolist, Illinois 60434		
Notice to the person who issues or a lf this subpoena commands the production of documents, electronic			

(9 of 15.

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٠.	JINLLED	DIAICO	DISTRICT	CUURI

NORTHERN DISTRICT OF ILLINOIS Civil Action No. 13- CV- 5037 SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION TO: WEXFORD HEATH SOURCES, INC., PRENTICE HAll CORPORATION, 801 Adlai Stevenson Drive, Spring Field, IL 62703
(Name of person to whom this subpoena is directed) Production: YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: Any And All, WEXTORD HEATHL SOURCES, INC., Specialty CARE Policies And PROCEDURES, FRom the YEAR Zell - PRESENT. Which Shall include Any Amendments And RENEWALS. Place: LESTER DOBBEY, # R-16237
P.O. BOX 112

Dollet, IL 60434

MARCH 11, 2019 At 1:00 p.m. ☐ Inspection of Premises: YOU ARE COMMANDED to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it. Place: Date and Time: The following provisions of Fed. R. Civ. P. 45 are attached - Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so. Date: FEB - 8 2019 OR Attorney's signature The name, address, e-mail address, and telephone number of the attorney representing (name of party). , who issues or requests this subpoena, are:

Notice to the person who issues or requests this subpoena

(10 of 15.)

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF ILLINOIS

	Of Committees
LESTER DOBBEY Plaintiff v.	Civil Action No. 13-CV-5037
DR. IMHOTEP CARTER) Defendant)	
SUBPOENA TO PRODUCE DOCUMENTS OR TO PERMIT INSPECTION OF PR WEXFORD HEAHL SOURCES, ILLC., To:	S, INFORMATION, OR OBJECTS EMISES IN A CIVIL ACTION
PRENTICE Hall Corporation, 801 Adlai Ster	ELSON DRIVE SPRINGFIELD, IL 62703 is subpoena is directed)
Deproduction: YOU ARE COMMANDED to produce at the documents, electronically stored information, or objects, and to produce the last of any and all, wextored thealth in the Health Care Unit at Stateville Correction (Monthly List): January 2011 than December 2011 January 2013 than September 2013; November 2011	ermit inspection, copying, testing, or sampling of the bounces, Inc., Contractual Employees oral center, for the mouths and year.
Place: LESTER DOBBEY, # R-16237 P.O. BOX 112	Date and Time:
Joliet, IL 60434	MARCH 11, 2019 At 1:00 p.m.
O Inspection of Premises: YOU ARE COMMANDED to other property possessed or controlled by you at the time, date, ar may inspect, measure, survey, photograph, test, or sample the property place:	nd location set forth below, so that the requesting party perty or any designated object or operation on it.
race.	Date and Time:
The following provisions of Fed. R. Civ. P. 45 are attache Rule 45(d), relating to your protection as a person subject to a sul respond to this subpoena and the potential consequences of not do	opoena; and Rule 45(e) and (g), relating to your duty to
Date: <u>FEB - 8 2019</u>	
CLERK OF COURT ZNin Casul Signature of Clerk or Deputy Clerk	OR Attorney's signature
The name, address, e-mail address, and telephone number of the a	ttorney representing (name of party) Plainstiff, , who issues or requests this subpoena, are:
LESTER DOBBEY # R-16237, P.O. BOX 112	* * * * * * * * * * * * * * * * * * * *
Notice to the person who issues or	
If this subpoena commands the production of documents, electron	ically stored information, or tangible things or the

(II OF 15)

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF ILLINOIS

DRIMHOTER CARTER Defendant) Civil Action No. 13-CV-5037		
OR TO PERMIT INSPECTION OF TO: WEXFORD HEALTL SOURCEST INC., PRENTICE HALL CORPORATION, 801 Adlai S	MENTS, INFORMATION, OR OBJECTS OF PREMISES IN A CIVIL ACTION Stevenson Drive, Spring Field, IL 62703		
(Name of person to Production: YOU ARE COMMANDED to prod documents, electronically stored information, or objects, a material: A Monthly List of any and all we Employeds in the Health Care Unit at States And YEARS: FEBRUARY 2014; MAY 2014 than J	whom this subpoena is directed) uce at the time, date, and place set forth below the following and to permit inspection, copying, testing, or sampling of the bitored than the Sources, Inter, Contractual cities Correctional Center, for the months toly 2014; September 2014 than December 2014; JUARY 2016 thru November 2016; February 2017;		
Place: LESTER DOBBEY, # R-16237 P.O. BOX 112 Joliet, JL 60434	Date and Time: MARCH 11, 2019 At 1:00 p.m.		
☐ Inspection of Premises: YOU ARE COMMAND other property possessed or controlled by you at the time, may inspect, measure, survey, photograph, test, or sample	ED to permit entry onto the designated premises, land, or date, and location set forth below, so that the requesting party the property or any designated object or operation on it.		
Place:	Date and Time:		
The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so. Date: FEB - 8 2019			
CLERK OF COURT Signature of Clerk or Deputy C	OR Slerk Attorney's signature		
The name, address, e-mail address, and elephone number LESTER DOBBEY LESTER DOBBEY ROLL ROLL ROLL ROLL ROLL ROLL ROLL ROL	, who issues or requests this subpoena, are:		
Notice to the person who is If this subpoena commands the production of documents, or	sues or requests this subpoens electronically stored information, or tangible things or the the subpoens must be served on each party in this case before		

it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

(12 of 15)

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF ILLINOIS

DRITHOTEP CARTER Defendant	Civil Action No. 13-CV-5037		
SUBPOENA TO PRODUCE DOCUMENTS OR TO PERMIT INSPECTION OF PRE To: WEXTORA HEAHL SOURCES, I.J.C.,	MISES IN A CIVIL ACTION		
PRENTICE HALL CORPORATION, 801 Adlai Steven (Name of person to whom thi	SON DRIVE, SPRINGFIELD, IL 62703		
Production: YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: A monthly List of any and all westord thealth sources, The, Contractual Employees in the thealth care unit at Stateville Correctional Center, for the months and years: July 2017; November 2018; December 2018; January 2019 thru March 2019			
Place: LESTER DOBBEY, # R-16237 P.O. BOX 112	Date and Time:		
301ist, IL 60434	MARCH 11, 2019 At 1:00 p.m.		
other property possessed or controlled by you at the time, date, an may inspect, measure, survey, photograph, test, or sample the property possessed or controlled by you at the time, date, an may inspect, measure, survey, photograph, test, or sample the property possessed or controlled by you at the time, date, and may inspect, measure, survey, photograph, test, or sample the property possessed or controlled by you at the time, date, and may inspect, measure, survey, photograph, test, or sample the property possessed or controlled by you at the time, date, and may inspect, measure, survey, photograph, test, or sample the property possessed or controlled by you at the time, date, and may inspect, measure, survey, photograph, test, or sample the property possessed or controlled by you at the time, date, and may inspect, measure, survey, photograph, test, or sample the property possessed or controlled by you at the time, date, and the property possessed or controlled by you at the time, date, and the property possessed or controlled by you at the time, date, and the property possessed or controlled by you at the time, date, and the property possessed or controlled by you at the time, date, and the property possessed or controlled by you at the time, date, and the property possessed or controlled by you at the time, date, and the property possessed or controlled by you at the time, date, and the property possessed or controlled by you at the time, and the property possessed or controlled by you at the time, and the property possessed or controlled by you at the time, and the property possessed or controlled by you at the time, and the property possessed or controlled by you at the time, and the property possessed or controlled by you at the time, and the property possessed or controlled by you at the time, and the property possessed or controlled by you at the time, and the property possessed or controlled by the property possessed or controlled by the property possessed or controlled by the property possessed or c	d location set forth below, so that the requesting party		
Place:	Date and Time:		
The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so. Date: FEB - 8 2019 OR CLERK OF COURT OR			
The name, address, e-mail address, and telephone number of the at	torney representing (name of party) Plaintiff , who issues or requests this subpoena, are:		
LESTER DOBBEY, #R-16237, P.O. BOD	2 112, Joliet, Illiwois 60434		
Notice to the person who issues or If this subpoena commands the production of documents, electron	requests this subpoens		

(13 of 15.)

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF ILLINOIS

Plaintiff V. DR. IMHOTEP CAPTER Defendant	Civil Action No. 13-CV-5037		
SUBPOENA TO PRODUCE DOCUMENTS OR TO PERMIT INSPECTION OF PRE To: WEXFORD HEAHL SOURCES, INC., [Name of person to whom the	EMISES IN A CIVIL ACTION		
Production: YOU ARE COMMANDED to produce at the documents, electronically stored information, or objects, and to produce at the store of the store o	the time, date, and place set forth below the following ermit inspection, copying, testing, or sampling of the		
Place: LESTER DOBBEY, # R-16237 P.O. BOX 112 Joliet, JL 60434	Date and Time: MARCH 11,2019 At 1:00 p.m.		
Inspection of Premises: YOU ARE COMMANDED to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.			
Place:	Date and Time:		
The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.			
Date: FEB - 8 2019 CLERK OF COURT Casul Signature of Clerk or Deputy Clerk	OR Attorney's signature		
The name, address, e-mail address, and telephone number of the a LESTER DOBBEY, #R-16237, P.O. Box	, who issues or requests this subpoena, are:		
Notice to the person who issues or If this subpoena commands the production of documents, electron	requests this subpoena		

(14 of 15.)

Civil Action No. 13-CV-5037 (LESTER DOBBEY V. IMHOTER CARTER) (N.D. III.)

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

	I received this subpoena f	OF (name of individual and title, if ar	ny)	
on (date	<i></i> .			*
(I served the subpoena Inc., Registered Spengfield IL 62703, I returned the subpoen	Agent, Prentice Hall C by U.S. Postal Service	ned person as follows: WEXFORD ORPOPATION, 801 Adlai Steven on (date) 2.20.19;	HEALL SOURCES, SOLL DRIVE, Or
	- I rotarnod the subjection	a unexecuted because.		
	Unless the subpoena was tendered to the witness the	issued on behalf of the United e fees for one day's attendance	States, or one of its officers or agents, I e, and the mileage allowed by law, in the	have also
	\$			
My fee	es are \$	for travel and \$	for services, for a total of \$	0.00 .
	I declare under penalty of	perjury that this information is	s true.	
Date:	2.20.19		Server's signature	
		LESTER	DOBSEY (PRO 55- P) A Printed name and title	HUHITE)
		#R-16237,	P.O. Box 112, Jolist, IL	60434

Additional information regarding attempted service, etc.:

(15 of 15.)

Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

(c) Place of Compliance.

(1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

 (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or

(B) within the state where the person resides, is employed, or regularly transacts business in person, if the person

(i) is a party or a party's officer; or

 (ii) is commanded to attend a trial and would not incur substantial expense.

(2) For Other Discovery. A subpoena may command:

(A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and

(B) inspection of premises at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

(A) Appearance Not Required. A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) Objections. A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

(i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an

order compelling production or inspection.

(ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

(A) When Required. On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

(i) fails to allow a reasonable time to comply;

- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or

(iv) subjects a person to undue burden.

- (B) When Permitted. To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:
- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) Specifying Conditions as an Alternative. In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

(i) shows a substantial need for the testimony or material that cannot be

otherwise met without undue hardship; and

(ii) ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

- Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:
- (A) Documents. A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.
- (B) Form for Producing Electronically Stored Information Not Specified. If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) Electronically Stored Information Produced in Only One Form. The person responding need not produce the same electronically stored information in more than one form.

(D) Inaccessible Electronically Stored Information. The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

(A) Information Withheld. A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

(i) expressly make the claim; and

(ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt.

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

EXHIBIT 2

STATE OF ILLINOIS	55)
COUNTY OF Will	•) SS)

AFFIDAVIT

I, LESTER DOBBEY being first duly sworn under oath depose and state that the foregoing is true and correct and made upon my personal knowledge and I am competent to testify thereto.

I Am A NAMED PARTY IN: LESTER DOBBEY V. Imhotep CARter, CASE
NO. 13-CV-5037 (U.S. N. DIST. Ct.) (III)

ON FEBRUARY 20, 2019, I issued and SERVED WEXFORD HEALTH SOURCES, Inc. with a 15 page Subpoena, Whereas RESPONSE Was initially due and MARCL 11, 2019 by 1:00 p.m.,

ON MARCH 13, 2019, during A Status HEARING the Court. Extend their time to comply because wextural RECEIVED the Subpoerias late.

As of May 17, 2019, WEXFORD HEAlth Sources, Inc. has
REFUSED to comply with the FEBRUARY 20, 2019 Subpoents
Without Excusable NEglect. WEXFORD REMAINS SILENT.

Pursuant to 28 USC 1746, 18 USC 1621 or 735 ILCS 5/109, I declare, under penalty of perjury, that I am a named party in the above action, that I have read the above documents, and that the information contained therein is true and correct to the best of my knowledge.

DATE: 5.17 2019

NAME: LETIER DOBBE

EXHIBIT 3

UNITED STATES DIS	
NORTHERN DISTRICT	OF ILLIHOIS
LESTER DOBBEY Plaintiff V. TMHOTEP CARTER Defendant	Civil Action No. 13-CV-5037
SUBPOENA TO PRODUCE DOCUMENTS, OR TO PERMIT INSPECTION OF PRE To: To: To: The High shall Concending 801 Admin Shall	MISES IN A CIVIL ACTION
PRENTICE HALL CORPORATION, 801 Adlai Stevi (Name of person to whom this	subpoena is directed)
DE Production: YOU ARE COMMANDED to produce at the documents, electronically stored information, or objects, and to permaterial: Any And All, Daily Attendance RENOTIFICATION OF ABSENCE And CAll-IN REPORT July 2011 thru May 2012.	rmit inspection, copying, testing, or sampling of the
Place: LESTER DOBBEY#R-16237 P.O. BOX 112 Joliet, IL 60434	Date and Time: April 8,2019 By: 1:00p.
☐ Inspection of Premises: YOU ARE COMMANDED to pother property possessed or controlled by you at the time, date, and may inspect, measure, survey, photograph, test, or sample the property	l location set forth below, so that the requesting party
Place:	Date and Time:
The following provisions of Fed. R. Civ. P. 45 are attached Rule 45(d), relating to your protection as a person subject to a subgrespond to this subpoena and the potential consequences of not do Date: FEB - 8 2019	poena; and Rule 45(e) and (g), relating to your duty to
CLERK OF COURT Com Casul Signature of Clerk or Deputy Clerk	OR Attorney's signature
The name, address, e-mail address, and telephone number of the at LESTER DOBBEY# R-16237, P.O. Box 112, Joly	

Notice to the person who issues or requests this subpoena

Civil Action No. 13-CV-5037

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

	I received this subpoena	for (name of individual and title, if any)		
On (dat	e)				20.5 - 191
		n by delivering a copy to the name			
	Mail	Registered Agent, by	on (date)	3.20.2019;	or
	☐ I returned the subpoe	na unexecuted because:			
	Q	19		711111111111111111111111111111111111111	
	-	s issued on behalf of the United S he fees for one day's attendance,		•	
My fee	es are \$	for travel and \$	for ser	vices, for a total of \$	0.00
	I declare under penalty of	of perjury that this information is	true.		
Date:	3 - 20 - 2019		Serve	er's signature	
		LESTER	DOBBE	Mandre and title	FF)

#R-16237, P.O. Box 112, Joliet, IL 60434 Server's address

Additional information regarding attempted service, etc.:

Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

(c) Place of Compliance.

(1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

(A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or

(B) within the state where the person resides, is employed, or regularly transacts business in person, if the person

(i) is a party or a party's officer; or

(ii) is commanded to attend a trial and would not incur substantial expense.

(2) For Other Discovery. A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
 - (B) inspection of premises at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

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(A) Appearance Not Required. A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

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(i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.

(ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

(A) When Required. On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

(i) fails to allow a reasonable time to comply;

(ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);

(iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or

(iv) subjects a person to undue burden.

(B) When Permitted. To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

 disclosing a trade secret or other confidential research, development, or commercial information; or (ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) Specifying Conditions as an Alternative. In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

(i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and

(ii) ensures that the subpoenaed person will be reasonably compensated.

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(D) Inaccessible Electronically Stored Information. The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule

26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

(A) Information Withheld. A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must

(i) expressly make the claim; and

(ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt.

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.



STATE OF ILLINOIS	٠)
COUNTY OF will	•) SS)

AFFIDAVIT

I, LESTER Dobbey being first duly swom under oath depose and state that the foregoing is true and correct and made upon my personal knowledge and I am competent to testify thereto.

I AM A NAMED PARTY IN: LESTER DOBBEY V. Imhotop CARTER, CASE NO. 13-CV-5037 (U.S. DIST. CT. N. III.)

ON MARCH 20, 2019, I issued and served wextord HEAlth.

Sources, Inc. With A 3 pages Subpoena, Whereas Response.

WAS due on April 8, 2019 by 1:00 pin

As of May 17, 2019, WEXFORD HEAlth Soveces, INC. has REFUSED to comply with the MARCH 20, 2019 . Subpoena without . Excusable Neglect.

WEXTORD REMAINS SILENT.

Pursuant to 28 USC 1746, 18 USC 1621 or 735 ILCS 5/109, I declare, under penalty of perjury, that I am a named party in the above action, that I have read the above documents, and that the information contained therein is true and correct to the best of my knowledge.

DATE: 5-17-2:019

NAME: LESTER DOBBEY

	INTHE
	UNITED STATES DISTRICT COURT
	NORTHERN DISTRICT OF ILLINOIS
	LESTER DOBBEY Plaintiff/Petitioner)
	Vs. No. 13-cv-5037
•	TMHOTEP CARTER Defendant/Respondent
	PROOF/CERTIFICATE OF SERVICE
	TO: U.S. District Court Atta: Prison Correspond 219 South DEARborn Chicago, Il 60604 TO: CASSIDAY Schade, UP Atty! James Maruna 222 West Adams St., Suite 2900 Chicago, Il 60606
	PLEASE TAKE NOTICE that on MAYITH, 2019, I placed the attached or enclosed documents in the institutional mail at STATEVINE Correctional Center, properly addressed to the parties listed above for mailing through the United States District Court E-Filing System "Plaintiff's Third Motion to Enforce Subpoent Against (NOU-PARTY) Wexford Health Sources, Inc.,
*	DATED: 5.17.2019 Name: Les TER DOBBEY IDOC#: R-16237 Address: Stateville C.C. P.O. Box UZ Joliet, IL 60434
	Subscribed and sworn to before me thisday of20
	Notary Public
•	